

United States Bankruptcy Court

Eastern District of Pennsylvania

In Re:

Frederick Paul Mraz

Debtor

Chapter 13

Bankruptcy No. 24-11284-AMC

JUL 18 2024

MARY MCGINNIS, CLERK  
BANKRUPTCY COURT

JK

Debtors Motion to Retain Chapter 13 Bankruptcy Pursuant to 11 U.S.C. Section 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. The Debtor is Frederick Paul Mraz, 9 Woodchuck Way, Kennett Square, PA 19348
2. The within case was commenced by the filing of a Chapter 13 petition on 4/16/2024
3. The Motion to dismiss should be rejected for the following reasons:

Debtor has complied with 11 U.S.C Section 521 (a) (1)(B)(iv) and filed copies of all payment advices or other evidence of payments received within 60 days of filing of the petition from any employer. Debtor did not receive payments from any employer.

While there has been unreasonable delay by the debtor that is prejudicial to creditors, debtor has the secured funds to pay creditors in the schedule listed in the filing, and has engaged the assistance of Senator John Fetterman's office to help secure the funds due the debtor.

Debtor has made all required payments to the trustee

Debtor has submitted an affidavit to the Trustee stating the debtor has not filed any Federal or State taxes for more than 7 years, thus tax returns to comply with U.S.C. Section 521 (e)(2), is not possible.

*Frederick Mraz*  
July 18, 2024